

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

LAWRENCE (LARRY) W. SINCLAIR)	
Plaintiff, Pro Se)	
)	Case No. 5:23-CV-109
VS)	
)	
BRIAN MARK KRASSENSTEIN, et al)	
<u>Defendants.</u>)	

**PLAINTIFF REPLY TO DEFENDANTS RESPONSE (DKT 34) TO PLAINTIFFS
MOTION FOR EMERGENCY RESTRAINING ORDER (DKT 23)**

PLAINTIFF, Lawrence (Larry) W. Sinclair respectfully files this **REPLY TO
DEFENDANTS RESPONSE (DKT 34) TO PLAINTIFFS MOTION FOR EMERGENCY
RETSRAINING ORDER (DKT 23).**

Plaintiff notes that defendants have again inserted their motion for change of venue in their response and since said motion has been made now in Three (3) filings before this Court plaintiffs response to it is withing the original filings.

Defendants in their response have again demonstrated their willingness to misstate facts before this Court. The claim of restraining “prior speech” and defendants

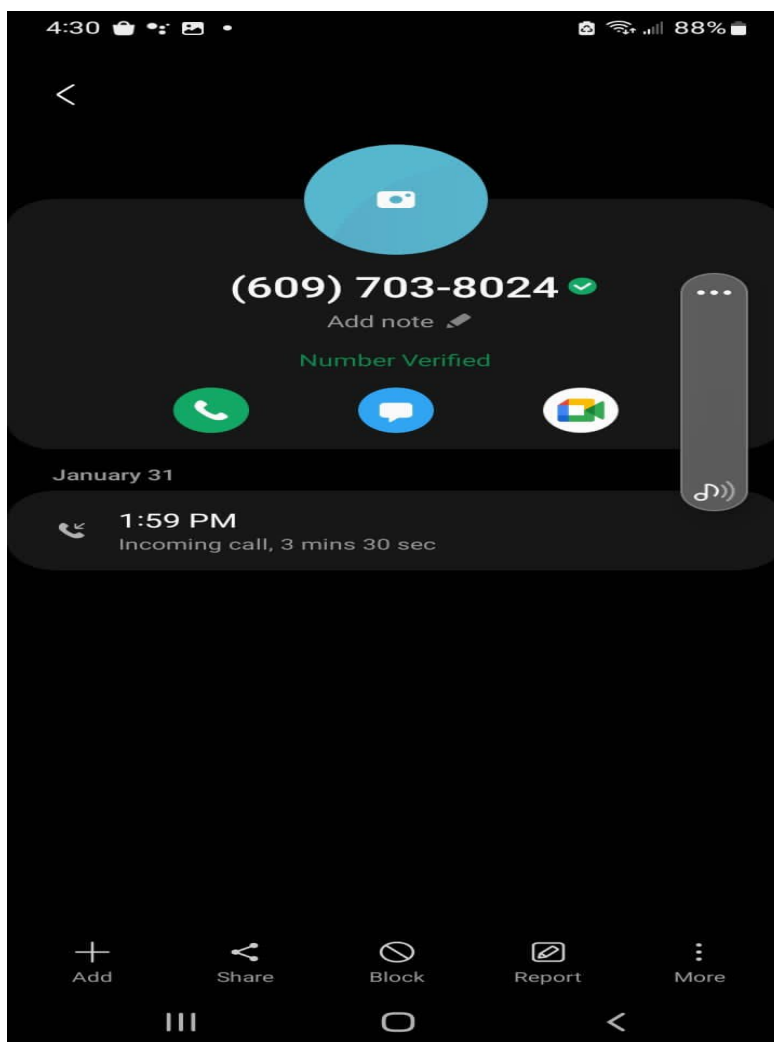
referring to Mr. Gamez affidavit and the statements therein prior to Defendant Edward Krassenstein calling and harassing and threatening are false.

Defendant Edward Krassenstein and Brian Krassenstein chose to make comments and contact Mr. Gamez after Plaintiffs response and affidavits were filed. Defendant Brian Krassenstein chose to use his X platform to make the comment (which many individuals immediately saw as a direct reference to Plaintiff) before Defendants filed their Reply (Dkt 25) accusing plaintiff of perjury on Feb 1, 2024.



Defendant Edward Krassenstein made his phone calls to Mr. Gamez interesting enough ten (10) minutes after plaintiff filed his first response to defendants Motion pursuant to Rule 12 b 1. As demonstrated by ECF timestamp of 1:49PM and Defendants call to Mr. Gamez at 1:59PM. For defendants counsel to claim Mr. Gamez affidavit statement filed 10 minutes before defendant Edward Krassenstein calls his

place of business demanding he answer defendants questions is a deliberate attempt to mislead this court as well as to try any defame Mr. Gamez in the process.



Defendants attempt to allege the caller is “alleged” to be defendant is also misleading. A screen shot of the call info is below and Mr. Krassenstein identified himself as “Eddie” which according to multiple individuals who defendants have history of contacting and harassing have confirmed is exactly how he identified himself in those events.

Defendants argue such restraining order would prevent discovery, that is not true and despite defendants being noticed multiple times since September 2023 of their obligation to preserve evidence pursuant to Federal Rules Civil Procedure 37(e).they have chosen to engage in extensive cleanup of posts from their X accounts.

Discovery if Defendants wish to engage in at this point is more than welcomed by plaintiff, but in accordance with case management order.

Plaintiffs Motion For Restraining Order is proper and this Court show GRANT it and issue requested order.

Respectfully Submitted,
Lawrence Sinclair

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Plaintiff, Pro Se
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CERTIFICATE OF SERVICE

I Lawrence (Larry) W. Sinclair HEREBY certify that a true and correct copy of the foregoing **PLAINTIFF REPLY TO DEFENDANTS RESPONSE (DKT 34) TO PLAINTIFFS MOTION FOR EMERGENCY RETSRAINING ORDER (DKT 23)** has been furnished electronically by email (as well as the Courts ECF-CM electronic filing system by Clerk of Court) to Charles A. Bennett cbennett@bennettlegal.com Counsel for Defendants this 12th day of February 2024.

Lawrence Sinclair

Lawrence (Larry) W. Sinclair

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